

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

_____X

JOHN DOE,

Plaintiff,

v.

Civil Action No.: 24 cv 06117

INTEL CORPORATION, ALAA BADR and
ABDUL JARRAR,

Defendants.

_____X

DECLARATION OF ALAA BADR

Pursuant to 28 U.S.C. § 1746, Alaa Badr declares as follows:

1. I am one of the Defendants in this action. I submit this declaration based upon my personal knowledge.
2. I have reviewed the Complaint filed in this action, and am aware that Plaintiff is seeking to file his action using the alias John Doe, purportedly out of a concern for his safety.
3. I deny the allegations that I discriminated or retaliated against Plaintiff. Nonetheless, since the filing of this action, there were articles in at least the New York Post, Ynetnews, Reuters, MSN, Law360, and Evrim Agaci about the case.
4. Thereafter, I received approximately 50 hateful messages over LinkedIn, text, and email. For example, on August 13, 2024 someone called me three times on my work number, and left voicemail messages in which they called me a "terrorist supporter".
5. On August 15, 2024, I received a call from an unknown number from a person who identified himself as a "general from the Mossad", and who stated that he was going to kill me the next time I flew back to the Middle East.

6. On August 18, 2024, someone calling themselves "Mark Matyazik" (vitaminrocks@icloud.com) sent an email to my Intel email address which read: "So we hear you're an active anti semite? Not good for you. Well at least we know where you live and work wimpy scum. See you".

7. I also found myself added to WhatsApp groups without my knowledge, and received threats and insults from group members. These messages included: "we will f*** you and those likely out of the country", "you are a scumbag and terrorist supporter and we will ensure you never ever work here again", "oh, look another antisemitic f***", and "just remember we have your family in our sights as well".

8. As the result of these messages, I am very concerned for my safety and the safety of my family. In that regard, my eldest daughter, who participated in an internship at Intel, received multiple calls from reporters on the same day the New York Post article was published, which suggests that it is not difficult to locate my daughter. As a result of the threats and other messages, I engaged with representatives of Intel corporate security to advise me regarding my family's safety.

9. I have also been attacked professionally. In that regard, various people and groups on LinkedIn initiated a spam campaign on my account, attaching posts of the New York Post article to ten years' worth of unrelated posts of mine. I had to remove those posts to avoid further reputational damage.

Dated: September 10, 2024
New York, New York


ALAA BADR